

FILED

OCT 17 2014

CLERK, U.S. DISTRICT COURT  
By Deputy

UNITED STATES OF AMERICA

v.

CASEY ROSE

CRIMINAL NO. 3:14-CR-367

**MOTION FOR DETENTION**

The United States moves for pretrial detention of defendant, Casey Rose, pursuant to 18 U.S.C. §3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

Crime of violence (18 U.S.C. §3156);

Maximum sentence life imprisonment or death

10 + year drug offense

Felony, with two prior convictions in above categories

Serious risk defendant will flee

Serious risk obstruction of justice

Felony involving a minor victim

Felony involving a firearm, destructive device, or any other dangerous weapon

Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

Defendant's appearance as required  
 Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because (check one or both):

Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)  
 Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)  
 Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251  
 Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

At first appearance  
 After continuance of \_\_\_ days (not more than 3).

DATED this 16th day of October, 2014.

Respectfully submitted,

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

/s/ P.J. Meitl

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on this 16th day of October 2014.

/s/ P.J. Meitl

P.J. MEITL  
Assistant United States Attorney